

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0614

**Direct Testimony of Theresa M. Bates
On Behalf of Ameritech Illinois**

Ameritech Illinois Exhibit 5.0

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DIRECT TESTIMONY OF THERESA M. BATES

ON BEHALF OF AMERITECH ILLINOIS

I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Theresa M. Bates. My business address is Three Bell Plaza, Room 720H5, Dallas, Texas 75202.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by SBC Operations Inc. as Area Manager – Collocation in Network Regulatory.

Q. AS AREA MANAGER – COLLOCATION – NETWORK REGULATORY, WHAT ARE YOUR GENERAL DUTIES?

A. My primary responsibility is to represent network interests and policies on regulatory and wholesale market issues that impact the networks of the SBC incumbent local exchange carriers, including Ameritech Illinois .

Q. PLEASE BRIEFLY SUMMARIZE YOUR WORK EXPERIENCE AND EDUCATIONAL BACKGROUND.

A. I have a Master of Business Administration with a major in Telecommunications from the University of Dallas, Dallas, Texas, and a Bachelor of Science, major in Management and minor in Economics from Texas Woman's University, Denton, Texas. I also have completed network switching and many other training courses

24 sponsored by the Bellcore/Telecordia, Southwestern Bell, AT&T, Northern
25 Telecom, Ericsson as well as TRA.

26 I have been employed in telecommunications for 19 years. Since 1987, I have
27 held management positions at Southwestern Bell Telephone in many different
28 capacities. Prior to my current position, I was employed as a CLEC Account
29 Manager, Area Manager and Regional Service Manager-CLECs. I have also held
30 positions in engineering as Manager – Network Engineering, Manager – Network
31 Switching, Manager – Operator Services (OS) Marketing, Manager –TOPS
32 Facilities Management OS [NTI (Northern Telecom) DMS 100/200 Traffic
33 Operator Position Systems (TOPS)].

34 Prior to 1987, I worked for AT&T Communications in various positions (planning
35 Operator Services' facilities and switching equipment for Missouri, Oklahoma,
36 Kansas, Arkansas) and assumed additional financial, supervisory and
37 administrative positions.

38 Q. **HAVE YOU PREVIOUSLY TESTIFIED BEFORE ILLINOIS**
39 **COMMERCE COMMISSION?**

40
41 A. Yes. I testified in TDS Metrocom, Inc's Petition for Arbitration of
42 Interconnection Terms and Conditions and Related Arrangements with Ameritech
43 Illinois, No. 01-0338, as the primary witness on physical collocation.

44

45 Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

46 A. The purpose of my testimony is to discuss Ameritech Illinois' Collocation tariff
47 and explain how that tariff, with the modifications proposed by the Company in

48 this proceeding, complies with the collocation and cross connect requirements of
49 Section 13-801(c) of the Illinois Public Utilities Act.

50

51 Q. DO AMERITECH ILLINOIS' PROPOSED MODIFICATIONS TO ITS
52 COLLOCATION TARIFF (ILL.C.C NO. 20, PART 23. SECTION 4) TAKE
53 INTO ACCOUNT THE REQUIREMENTS OF SETION 13-801(C)?

54 A. Yes. Ameritech Illinois has proposed amendments to certain sheets contained in
55 the Collocation Tariff. The amendments, which the Company is proposing, are
56 reflected on the redlined version of the 13-801 Compliance Tariff Amendments
57 which the Company circulated to Staff and the parties to this proceeding on
58 October 5, 2001. Clean and redlined copies of those proposed tariff amendments
59 are included in Exhibits 1.1 and 1.2, respectively, sponsored by Mr. Wardin.

60

61 II. COLLOCATION

62

63

64 Q. SECTION 13-801(C) SET FORTH CERTAIN REQUIREMENTS FOR
65 COLLOCATION. DOES THE COMPANY'S COLLOCATION TARIFF,
66 AS MODIFIED, COMPLY WITH THOSE REQUIREMENTS?

67 A. Yes, I believe it does. Ameritech has included language to address the
68 requirement of 13-801(c), for both physically and virtually collocated equipment.
69 That language is contained on 4th Revised Sheet No. 1.2 of the redlined version of
70 Ameritech Illinois' proposed Collocation Tariff.

71

72 Q. CAN YOU DIRECT THE COMMISSION TO THE COMPLIANT
73 LANGUAGE TO WHICH YOU ARE REFERRING?

74

75 A. Yes. As shown on 4th Revised Sheet No. 1.2, Ameritech Illinois has
76 modified the language of Paragraph 10.a.1., which describes, in part, the
77 types of equipment that may be collocated. It clearly provides for
78 "physical and virtual collocation" of "any type of necessary equipment,"
79 mirroring the wording of Section 13-801(c). The proposed tariff language
80 includes this revision required by the legislation, while maintaining the
81 federal standard that the equipment be "necessary"¹ for interconnection or
82 access to network elements. This paragraph in the makes clear that this
83 tariff conforms to the requirements of both the federal and state law.

84 Further, Paragraph 10.a.1. has been modified to include an explicit
85 inclusion of the specific types of equipment which the Illinois statute lists
86 as being permitted for collocation , as well as language regarding
87 microwave transmission facilities used for interconnection or access to
88 Ameritech's unbundled network elements (UNEs). This proposed
89 language is in keeping with Section 13-801(c)'s requirements that such
90 equipment must be used for interconnection or access to Ameritech's
91 unbundled network elements, while communicating that the Company
92 need not, but may, voluntarily permit, on a non-discriminatory basis, the
93 collocation of equipment that is not necessary for interconnection or
94 access to UNEs.

95

96 **III. CROSS CONNECTS**
97

98 **Q. DOES SECTION 13-801(C) INCLUDE LANGUAGE REGARDING**
99 **CROSS CONNECTS?**

100 A. Yes. That Section provides that Ameritech Illinois will "allow, and provide for,
101 the most reasonably direct and efficient cross connects, that are consistent with
102 safety and network reliability standards, between the facilities of collocated
103 carriers." The Section further states that, consistent with safety and reliability
104 standards, Ameritech Illinois will "allow, and provide for, cross connects between
105 a "noncollocated telecommunications carrier's network elements, or a
106 noncollocated telecommunications carrier's transport facilities, and the facilities
107 of any collocated carrier." This language directly allows the CLEC to acquire,
108 through their Approved Vendor, that which the Legislature requires.

109 **Q. DOES THE COMPANY'S COLLOCATION TARIFF MEET THE FIRST**
110 **CROSS-CONNECT REQUIREMENT SUMMARIZED ABOVE?**

111 A. Yes. As shown in Paragraph 5 of Sheet No. 11 of Ameritech Illinois'
112 effective Collocation Tariff, the Company currently allows collocated
113 CLECs to directly connect to other collocated CLECs within the same
114 premises. Ameritech Illinois has proposed an amendment to the language
115 of Paragraph 5 of Sheet No. 11 to conform to Section 13-801(c)'s
116 directive that cross connections between collocated carriers shall be
117 provided for using the most reasonably direct and efficient connections
118 that are consistent with safety and network reliability.

125 A. Yes. Cross-connects to a non-collocated telecommunications carrier's
126 network element platform are discussed in the Direct Testimony of Mark
127 Welch.

128 Q. **DOES THE AMERITECH ILLINOIS COLLOCATION TARIFF, AS**
129 **AMENDED, ALLOW AND PROVIDE FOR CROSS-CONNECTS**
130 **BETWEEN A NON-COLLOCATED CARRIER'S TRANSPORT**
131 **FACILITIES AND THE FACILITIES OF ANY COLLOCATED**
132 **CARRIER?**

133 A. Yes. Ameritech Illinois has existing language in Ameritech's redlined
134 Tariff ICC 20, Part 23, Section 4, Sheet 9.2, C.2, first bullet point, which
135 already provides for connection from AIT-provided services to a
136 Collocated CLEC (C.2, Cross-Connections for Physical Collocation
137 Offerings).

138 Q. **ARE THERE ANY OTHER PROPOSED REVISIONS TO THE**
139 **COMPANY'S COLLOCATION TARIFF?**

140 A. Yes. On 2nd Revised Sheet No. 9.2, the Company has added an item to Paragraph
141 1.C.2., which lists offerings to which carriers are permitted to connect. The
142 additional language offers other cross-connections under the Illinois statute as
143 subsequently tariffed or made available through the BFR process.

144

145 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

146 A. Yes.